Williams Lake Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on the Timber Supply Review in the Williams Lake Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Williams Lake Timber Supply Area

Background

As part of the review of timber supply in the Williams Lake Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Williams Lake TSA *Data Package* and *Information Report* in August 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Williams Lake TSA. A 30-day review period, ending September 7, 1999, was provided for the public to comment on these documents.

On September 6, 2001, the British Columbia Forest Service released the *2001 Williams Lake Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 45-day review period that ended October 23, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the AAC for the Williams Lake TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Cariboo Forest Region office in Williams Lake.

Public Review Process and Response

Staff from the three forest districts in the TSA, as well as Cariboo regional staff, actively solicited public input on the Timber Supply Review in the Williams Lake TSA through the following actions:

- copies of the *Data Package, Information Report, Analysis Report* and *Public Discussion Paper* were mailed to stakeholders in the TSA, including First Nations, licensees, local governments and environmental groups. Meetings or presentations were offered.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- the *Data Package* and *Analysis Report* were available at the three district offices and the Cariboo regional office in Williams Lake. About 20 copies of the *Data Package* and 30 copies of the *Analysis Report* were picked up.
- copies of all the documents were made available to the local media. One interview was conducted with the local radio station and two interviews with the local newspaper.

Two formal meetings were held regarding the Timber Supply Review Process. One meeting was with the Cariboo Chilcotin Conservation Society and the other with the Williams Lake TSA Association. As well, informal discussions were held with the TSA Association throughout the development of the *Data Package* and at various points during the data review phase.

The forest district and regional offices received eight written submissions on the *Data Package* and six submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Williams Lake TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report
- Other comments

Williams Lake Timber Supply Area

Data Package

Land Base Factors

The submission from the Williams Lake TSA Licensee Association (the Licensee Association) recommends the Taseko Management Zone be excluded from the timber harvesting land base (THLB) but be subject to a sensitivity analysis.

The Licensee Association says the widths estimated for existing road and skid-trail netdowns are inappropriate and that ingress of trees into road rights-of-way should be recognized.

Definition of the Operable Land Base

The Licensee Association says they have submitted performance data regarding harvesting on slopes over 40 per cent in the Williams Lake and Chilcotin forest districts. They ask why this data was not considered.

The Cariboo Chilcotin Conservation Society (the Conservation Society) questions why most slopes greater than 60 per cent in the Horsefly Forest District are included in the operable land base, while being excluded in the rest of the TSA.

The Horsefly District Homeowners & Ratepayers Association (the Horsefly Association) says that current practice in the Horsefly Forest District appears to be that steep slopes (over 60 per cent) are harvested without formal slope assessments and that areas to be removed from the THLB ("identified areas") are based on this questionable practice. In addition, the association says, not all areas of steep and/or unstable slopes are "identified" and they recommend that an overlay be prepared to do so and the THLB be reduced accordingly. The association says it appears necessary to also make a reduction for slopes over 40 per cent that do double duty (e.g., because they're visually sensitive or important for wildlife protection). If no further deductions are made now, there will be extreme pressure later to make up the timber supply shortfall from other areas that address non-timber values, according to this submission.

Low Sites and Unharvested Types

The Licensee Association says that data on performance in Problem Forest Types (PFTs) should be included in the *Data Package*, not just presented to the chief forester, as it represents valid current performance information. The Conservation Society questions how it happened that 100,000 cubic metres of PFTs were allocated but 400,000 cubic metres were harvested.

The Licensee Association says the term Marginal Forest Type (MFT) is new and the definition is vague or uncertain. The association says licensees are confused about how criteria for merchantability and MFTs relate to each other. They express the opinion that age of stands should not be a constraint and the rotation age should be extended until minimum harvestable volumes are achieved. The Licensee Association also expresses concern about how MFTs contribute to old growth requirements.

The Licensee Association poses several questions about the criteria used to define currently unharvested stand types and to exclude them from the THLB.

Pulpwood Agreement 16 Stand Types

The Licensee Association notes that PA16 exists for a finite period and modeling of these stand types for the entire planning horizon may be unnecessary. They say that after the first harvest, PA16 stands should transfer to normal analysis units because they will not continue to be marginal or problem forest types. The Licensee Association also notes that the full partitioned volume for PA16 may not have been harvested to date and asks how this will be modeled through the planning horizon.

Mountain Pine Beetle-Attacked Stands

The Licensee Association comments on various harvesting and silvicultural assumptions for stands attacked by mountain pine beetles (MPB):

- for stands with less than 50 per cent attack, they suggest adjusting for age by averaging the pre-attack age and the age recommended in Table 15.
- will modeling be sensitive to the split of the main TSA and the three western supply blocks?
- are volumes in the inventory file reduced for MPB attack?
- what does the last paragraph mean in referring to further adjustments to young stand ages based on the audit results for beetle-attacked stands?

Forest Inventory

The Conservation Society questions the existing inventory and its accuracy. The society urges consideration of inventory audit results that show a 12 per cent overestimation of mature volumes.

Expected Rate of Growth

The Conservation Society says using provincial site index adjustments is a "what if" not a "what is." They express the opinion that the results of the Old Growth Site Index (OGSI) study are based on bad science, and say it is better to stay with existing regional information. The Horsefly Association says both the growth rate adjustments (inventory audit results) and old-growth overestimates (OGSI adjustments) should be treated the same way (either both in the base case, or both in sensitivity analyses).

The Licensee Association says they are under the impression there is regionally-derived data to support the OGSI adjustments being applied to the Cariboo Region. They note that these adjustments affect many assumptions and must be considered carefully. The Licensee Association recommends that in the OGSI sensitivity analysis, the adjustment be applied to the entire land base (before netdowns) to ensure all constraints, criteria and class drivers are similarly affected.

The Licensee Association says Table 19 (Regeneration Assumptions) should clarify the assumptions used to estimate the expected growth rate for dry belt Douglas-fir. They recommend sensitivity analyses to change the mean annual increment from one cubic metre per year, to 1.5, 2.0 and 2.5 cubic metres per year.

The Licensee Association says they understand that all spruce planted east of the Fraser River is from improved seed, and this should be modeled in the analysis. The association also recommends a sensitivity analysis to examine harvesting at culmination age.

Regeneration and Silvicultural Factors

The Licensee Association questions why the dry belt Douglas-fir analysis unit has a different regeneration delay than the rest of the natural regeneration units. They also note that the cedar-hemlock components of this unit are naturally regenerated, not planted.

The Licensee Association says the assumption for normal selection harvesting that fir-leading forest types with logging disturbance records have just been logged and are currently between entries is inaccurate, and may add years to the normal return intervals. They recommend instead using history information in the forest inventory file, which provides a year of harvest.

With regard to return intervals for mule deer winter range selection harvesting (Table 16), the Licensee Association says the definition is confusing. For Douglas-fir, the association says there should be a 20 per cent

removal on a 30-year return interval. They also question the description of what volume is left in these selection stands.

The Licensee Association recommends some sensitivity analysis regarding commercial thinning.

Utilization Factors

The Licensee Association notes that the utilization levels in Table 11 of the *Data Package* are different from those in the *Information Report*. They also say the harvest of PA16 types takes place at the utilization levels stated within the tenure document, and the information in Table 11 should be adjusted to show increased utilization.

Green-up Requirements

The Licensee Association notes that the current field approach to assessing green-up is to average the height of the tallest 100 trees, with the result that the average height is closer to 2.1 metres (vs. three metres used in the *Data Package*). The association recommends consideration of this approach. They also express uncertainty about how converted MPB-attacked stands and the maximum disturbance constraints will interact.

With regard to visual quality objectives, the Licensee Association says the 25 per cent maximum disturbance for modified VQO areas should be 30 per cent (the same as for multiple use areas). They ask why a five-metre green-up height is required in the Horsefly Forest District, and recommend similar sensitivity analyses for the maximum allowable disturbance be done for the Horsefly District as for the other two districts.

Riparian Management

The Horsefly Association says swamp and wetland areas shown on maps provided by the Ministry of Forests are not accounted for by the riparian management requirements, and reductions for these areas must be made.

The Licensee Association expresses concern that the right shapes are used for stream/river buffers, particularly in the area covered by the ART consensus document for the Anahim supply block. They also ask that the direction regarding lakes contained in the Cariboo-Chilcotin Land Use Plan (CCLUP) be compared with lake classification assumptions in the Timber Supply Review, and this comparison be recorded for future reference.

Wildlife Management

The Horsefly Association questions how the maximum harvest rates for the caribou modified harvest area, the caribou partial cutting assumptions, and the caribou habitat forest cover requirements (all with different rotation ages) can be reconciled.

The Licensee Association states their belief that the 1998 Caribou Strategy Update is being used for sub-regional planning processes and could therefore be considered current management, and asks if it will be modeled in the analysis. The association asks how the timber supply implications of the CCLUP assumption of access to 10 per cent of the caribou no-harvest zone to salvage damaged timber will be estimated. The Licensee Association also questions how the maximum rates of harvest for the caribou modified harvest area will be applied and on what land base.

With regard to mule deer winter range management, the Licensee Association says the harvest deferrals presented in Table 17 are new information and they question various aspects of them. They recommend a sensitivity analysis that removes these deferrals. The association notes that the CCLUP and its Integration Report (CCLUPIR) provide that mule deer winter range harvest is available if needed to meet 20-year short-term timber availability requirements. The Licensee Association asks for clarification of their understanding that the

mule deer winter range prescription creates credits toward meeting old growth requirements.

The Horsefly Association notes the absence of any reductions to the THLB for environmentally sensitive wildlife areas. The association says provisions for caribou habitat and riparian management are insufficient to protect caribou, grizzly bears, and other fish and wildlife species covered by the Identified Wildlife Management Strategy, the Forest Practices Code and the CCLUP. Consideration of the effects of legislated requirements for wildlife is being deferred for five years when sufficient information exists now to make a reasonable impact assessment, according to this submission. The association urges this assessment be made now.

Wildlife Tree Patches

The Licensee Association asks how the ages of wildlife tree patches (WTPs) will be determined so they can contribute to mature and old growth retention requirements. The association says the CCLUPIR assumes that 50 per cent of the volume in WTPs is available for harvest over the first rotation and asks how this will be modeled.

Landscape Level Biodiversity

The Horsefly Association's submission says that current practice in the Quesnel Lake Special Resource Development Zone is resulting in elimination of a complete functioning ecosystem by liquidating old growth cedar-hemlock and replacing it with pine, fir and spruce. The association says this can have environmental impacts that should be addressed in the timber supply analysis.

The Licensee Association makes several comments about the requirements for landscape-level biodiversity, including the following:

- recommend the inventory adjustment used in the CCLUP biodiversity strategy be incorporated in the analysis.
- the CCLUPIR developed an 'overlap' model to account for various land uses on common areas; can the timber supply analysis model do this?
- the CCLUPIR approach was to meet old growth requirements outside the THLB first; the Timber Supply Review approach of oldest first will overestimate this constraint.
- the CCLUPIR directs that up to 10 per cent of the old-growth management areas may be accessed for timber target achievement or forest health reasons; this direction is missing from the *Data Package*.

Cariboo-Chilcotin Land-Use Plan

The Horsefly Association says the *Data Package* assumptions do not produce an adequate reduction factor to account for CCLUP requirements. The association says the failure to institute on schedule the landscape unit planning requirements of the CCLUP has caused wildlife habitat protection mandated by the land-use plan not to be applied in riparian management prescriptions or through the use of forest ecosystem networks. In particular, the association says the percentage reductions for caribou no-harvest areas are well known and must be accounted for, even if exact locations of these areas are not yet established.

The Conservation Society is of the opinion that the CCLUP seems to be an upward pressure on harvest levels and the CCLUPIR is insufficient to protect non-timber values. The society says the professional review of the Integration Report should be included in the Timber Supply Review.

First Nations

The Carrier Chilcotin Tribal Council (the Tribal Council) asserts aboriginal title to portions of the Williams Lake TSA for the Dene and for the territory of the Lhtako, Tlesq'ox and Ulkatcho communities. The Tribal Council says

the referral through the Timber Supply Review will cause or lead to interference with their aboriginal title and they do not consent to such interference. The Tribal Council advises they require financial assistance to properly consider the impacts of the review on their lands and people, and are prepared to submit a budget.

The Tribal Council also refers to the Delgamuukw decision:

- the Court required that aboriginal title be given priority. How has this been done?
- how will the issue of compensation for infringement of title be addressed?
- the Court outlined conditions for meaningful consultation; as well, the above questions must be answered prior to any detailed consultation with the Tribal Council.

The Conservation Society expresses pleasure that Cultural Heritage Resources are finally being considered, but says it is probably naive and risky to assume this issue can be managed operationally with minimum impacts on timber supply. The society says traditional uses tend to occur on the same good growing sites identified for forest management, and are impacted by timber removal. As well, the society says there are area impacts; for example, protecting a fishing spot is meaningless without ensuring the entire watershed is healthy.

Mill Requirements

Jackpine Forest Products points out that the value-added sector also requires timber to provide logs for lumber trade agreements with the primary wood processors. As well, the company says they are investigating a new fibreboard facility in Williams Lake and asks that the opportunity to access timber from currently unharvested stand types or marginal forest types be provided.

Ainsworth Lumber Co. says they are increasingly dependent on PA16 to supply their 100 Mile House OSB facility. The company suggests modeling the entire harvest commitment of 107,000 cubic metres in perpetuity, in order to illustrate the implications of increasing harvest levels and to provide insight into timber supply after the current tenure arrangement expires.

Mountain Pine Beetle Management

The Conservation Society says there is no evidence that removal of dead timber stops the beetle infestations; only very cold winters do that. Continuing the liquidation policy of harvesting above the long-term harvest level will deepen the falldown trough and increase the economic impact to the TSA, according to this submission.

Socio-Economic Factors

The Williams Lake & District Chamber of Commerce submission requests further information on how socio-economic goals and objectives for the Cariboo will be established, and asks who will prepare the socio-economic analysis.

Jackpine Forest Products notes that the *Data Package* makes only cursory mention of the value-added sector while indicating the socio-economic analysis will examine the implications of timber supply for the area's primary processing facilities. The company says that having a viable value-added industry must be identified as an economic and social objective of the Timber Supply Review.

The Conservation Society asks why only the socio-economic objectives expressed by the Minister of Forests are to be considered, and expresses the opinion that "social" is entirely dominated by "economic." The society proposes a revised set of socio-economic objectives:

- enhanced biodiversity, to ensure the presence of diverse climax forests that meet a wide range of objectives.

- respect for traditional aboriginal economics and cultures.
- economic parity between aboriginal and non-aboriginal residents.
- regional economic diversification.

Timber Supply Area Analysis Report

Land Base Factors

The submission from the Williams Lake TSA Licensee Association (the Licensee Association) says the assumptions used in the analysis for netdowns for roads, trails and landings (RTLs) are based on obligatory standards rather than empirical data. They say a field survey was conducted in 2001 to assess actual right-of-way widths and tree ingress on existing RTLs and the results showed a potential 1.3 per cent increase in harvest level by using netdown factors based on the survey. The Licensee Association recommends the new factors be incorporated in the analysis.

Ainsworth Lumber Co. Ltd. says they are focusing efforts on shifting their fibre dependency from private sources to Crown sources, and have identified a significant deciduous volume that is not currently allocated or included in the timber supply analysis. The company provides details on this available deciduous volume and requests it be included in the analysis, as their intent is to apply for tenure over any deciduous volume included in the AAC.

The Licensee Association says it does not make sense to remove marginal pine and fir stands with low site indices from the THLB once they have been harvested only because they have not achieved a particular height within a given time frame. These stands should remain in the THLB, according to the Licensee Association, providing an upward pressure on the long-term harvest level.

Site Productivity

The Licensee Association says they are involved in ongoing work to calibrate the Prognosis yield model in dry-belt Douglas-fir areas. They say using a different mean annual growth in the Prognosis model resulted in a 2.9 per cent increase in timber supply. The association says this issue should have been identified as a critical one, since the information in the *Analysis Report* is a known underestimate.

Forest Cover Requirements

The Licensee Association says that a two-metre green-up height was tested in the Chilcotin Forest District. This change created the opportunity to increase the harvest level by 0.5 per cent, according to this submission.

Identified Wildlife

The Horsefly District Homeowners & Ratepayers Association (the Horsefly Association) asks why the *Analysis Report* fails to name the red-listed western and eastern mountain caribou sub-populations. They say the needs of this endangered species need to be fully accounted for in the analysis.

Mountain Pine Beetle-Attacked Stands

West Chilcotin Forest Products says (2001) that redirecting their focus to harvesting areas recently affected by the mountain pine beetle (MPB) has resulted in an increase in hauling costs and in development costs due to forgoing other developed cutting permits. The company says they have increased their harvesting of new MPB-infected wood from 30,000 cubic metres last season to 70,000-90,000 cubic metres this season, and are able to utilize all MPB volumes, based on current populations. However, the company says further increases of that magnitude could place them in the position of exceeding cut control as their current licence provides for 140,000 cubic metres annually.

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Cariboo-Chilcotin Land-Use Plan

The Horsefly Association says the *Analysis Report* appears to create problems for implementation of the CCLUP by failing to consider the legal requirements of this higher level plan, as well as its spirit and intent, thus putting other forest values at risk. For example, the association says the Forest Practices Board found that the practices of the industry over the past five years have not properly implemented all of the legally mandatory provisions of the plan. Yet the analysis is based on "current forest management" regardless of how deficient those practices are under the Code or the CCLUP. The association also says the reductions for non-timber forest values, as determined by the land-use plan, will massively exceed what is assumed in the timber supply analysis.

Socio-Economic Factors

The Tatlayoko Think Tank (the Think Tank) says the socio-economic analysis (SEA) does not use up-to-date employment and income data, so its conclusions are suspect. For example:

- the SEA indicates a population increase of four per cent 1991-1996. Stats BC indicates a 0.8 per cent increase in 1999-2000.
- the SEA reports an unemployment rate of 11.4 per cent in 1996. Stats BC reports 13.4 per cent in 1999.

This submission notes the SEA lacks any discussion of dependencies, and says economic diversity in the TSA has decreased by four per cent in the last eight years. The Think Tank also says the SEA does not recognize that environmental sustainability is of primary importance when allocating timber harvests. Without it, there can be no long-term socio-economic sustainability, according to this submission.

Other Comments

Most submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The Horsefly Association says there are fundamental shortcomings in the assumptions used in the analysis (e.g., they're based on inadequate and outdated inventory and on a three-pass harvest when four-pass is current practice; practices that are detrimental or poor, or are subject to imminent change, are modeled). The association says the precautionary principle must be applied, because if legislated objectives are to be achieved, allowance must be made now to account for the known deficiencies of the data base.

The Licensee Association says the Timber Supply Review process and documents are significantly improved over the previous review. They detail numerous questions and concerns with regard to assumptions and definitions in the *Data Package*. With regard to the *Analysis Report*, the Licensee Association says they are encouraged by the basic message that the existing harvest level is sustainable but express the opinion that the sensitivity analyses focussed on assessing downward pressures on timber supply while disregarding key upward pressures. The Licensee Association says the process should incorporate analysis to indicate the potential to offset any perceived harvest decline.

The Conservation Society says the *Data Package* is confused about "what is" vs. "what if." They say the former is not just current practice but includes what is planned over the next five years at least (e.g., landscape unit planning is current, even if the results are not yet known). The society expresses the opinion that the Ministry of Forests has bent over backward to maintain an overall upward pressure on the AAC and this is unacceptable.

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The Tatlayoko Think Tank questions how the ministry can predict a sustainable rate of cut with such certainty 180 years into the future, given the variables around growing and cutting trees, uncertainties in computer models and anticipated effects of climate change.

Harvest Levels

The Licensee Association says that modeling the cumulative effect of new assumptions for RTLs, site productivity, marginal stands and green-up resulted in a five per cent timber supply increase, and they believe this increase is achievable using assumptions very close to the current management regime.

The Licensee Association says the opportunity to substantially increase the harvest level in the western supply blocks is apparent throughout the *Analysis Report*, but they recommend maintaining the current level pending the outcome of MPB infestation dynamics and the ongoing salvage program's impact on long-term harvest levels.

The Licensee Association recommends the current partition of 850,000 cubic metres for MPB-attacked stands be maintained to ensure continued access to candidate stands under the ongoing salvage program. They say the *Analysis Report* is unclear if the proposed reduction is based on the assumption that only standing living trees will be harvested, but the association is of the opinion that the dead tree component will continue to contribute merchantable volume, at least until the next Timber Supply Review.

Apportionment

Ainsworth Lumber Company says they are participating in a working group with the regional managers of the Cariboo and Kamloops forest regions to clarify management issues for Pulpwood Agreement #16 (PA16). The company says the issue of harvest apportionment for PA16 should be considered in the Timber Supply Review for four TSAs, including Williams Lake.

With regard to regional apportionment, Ainsworth recommends a 45/55 split between the Kamloops Region and the Cariboo Region, respectively, based mainly on timber availability shortfalls in the Lillooet TSA.

With regard to apportionment among TSAs, Ainsworth notes that the region and districts in the Cariboo region have not provided "exclusivity" to Ainsworth within PA16 and allow other licensees to harvest the forest types that Ainsworth is restricted to. The company recommends the Williams Lake apportionment for PA16 decrease from the current 107,000 cubic metres to 45,000 cubic metres, while the ministry recommends 30,000 cubic metres.

Jackpine Forest Products says they currently hold a forest licence for 60,000 cubic metres in the Chilcotin Forest District to facilitate salvage of MPB-damaged timber. The company says maintaining this type of licence, and the timber allocation for it, is critical, and will strengthen the entire forest industry.

Appendix 1

Submissions received by the Cariboo Forest Region

Submissions received on the Data Package

Forest industry

Williams Lake TSA Association
Ainsworth Lumber Co. Ltd.
Jackpine Forest Products Ltd.

First Nations

Carrier Chilcotin Tribal Council

Interest groups

Williams Lake & District Chamber of Commerce
Horsefly District Homeowners & Ratepayers Association (two submissions: Sept. 4 and Sept. 6, 1999)
Cariboo Chilcotin Conservation Society

Submissions received on the Timber Supply Analysis Report

Forest industry

Williams Lake TSA Licensee Association
Ainsworth Lumber Co. (two submissions: Oct. 3 and Oct. 22, 2001)
West Chilcotin Forest Products

Interest groups

Horsefly District Homeowners & Ratepayers Association
Tatlayoko Think Tank